



February 10, 2004
(Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq.
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
33 - Monthly Report; January 1 – January 31, 2004 Reporting period**

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting. This report is for the January 1 – January 31, 2004 reporting period.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Gary Vandiver'.

Gary Vandiver
Project Coordinator

cc: Nabil Fayoumi – USEPA Region 5
Sandra Bron - IEPA
Mike Coffey - USFW
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
Jeff Klieve - Monsanto

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Monthly Report

Date of Report: February 10, 2004
Period Covered: January 1, 2004 – January 31, 2004

Work Performed During the Reporting Period

Groundwater Monitoring

- *Revision 01 of the Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, it has been implemented.*
- Samples collected during the December 2003 quarterly sampling of the groundwater wells around the containment cell are being analyzed in accordance with the Draft Groundwater Monitoring Plan Revision 01.

TSCA Containment Cell

- *The Operations and Maintenance Report - submitted for the Agencies' review and approval on August 28, 2001- remain under review. Portions of the Plan applicable to the placement of sediments have already been approved.*
- Performed inspections of the site.
- Performed replacement of the filter sand and gravel in the 1st stage filter of the 50-gpm stormwater treatment system.
- Performed replacement of the lids on the two carbon tanks of the 2nd stage filter of the treatment system.
- Inspected and maintained the 6oz. geotextile/6 mil scrim reinforced poly cover over the containment cell.
- Maintained stormwater and leachate collection controls around the containment cell.

- Monitored support area facilities.

Dead Creek

Received U.S. EPA's comments for:

- *Dead Creek, Review of Responses to Comments and Proposed Action Plan*
- *Human Health Risk Assessment, Sauget Area One Site, Illinois.*

Solutia provided a general response on December 4, 2003 and requested a meeting with the Agencies. There are several substantive issues that need to be discussed and resolved before we can move forward with preparation of plans that will ultimately result in the completion of the remedy for Dead Creek.

Data Submittal

No data are submitted with this report.

Work Scheduled for Next Reporting Period

- Conduct routine inspection of the containment cell.
- Continue operation of the 50-gpm stormwater treatment system.
- Change carbon in the 2nd stage filter of the treatment system.
- Perform necessary operation and maintenance on the containment cell and temporary treatment system.
- Review groundwater samples for parameters in the Draft Groundwater Monitoring Plan Revision 01.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %

Submittal Schedule Status

See attached UAO schedule

May 31 Sauget Area I UAO Sediment Removal Action

SCHEDULE

Deliverable	Description	Due Date
Issuance Date	Date UAO signed by Muno	31-May-00
Effective Date	10 business day after issuance	14-Jun-00
Notice of Intent to Comply	3 business days after effective date	19-Jun-00
Designation of Contractor and Project Coordinator	5 business days after effective date	21-Jun-00
Access	14 calendar days after effective date	28-Jun-00
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	7-Jul-00

EPA Approval of TCRA W/P		May 10, 2001
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	June 10, 2001
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	May 22, 2002